

In the United States District Court for the  
Middle District of Pennsylvania

Jeremy Bailey,  
Plaintiff,

v.

Lieutenant Yoder  
Sergeant John Doe  
CO John Doe.1  
CO John Doe.2  
Defendants,

Civil Action No. 1:20-cv-1836

District Judge: Yvette Kane

FILED  
SCRANTON

MAR 04 2021

Per \_\_\_\_\_  
DEPUTY CLERK

Plaintiff  
First Set of Interrogatories  
to Defendants.

In accordance with Rule 33 of the Federal  
Rules of Civil Procedure Plaintiff request  
Defendant Lieutenant Yoder, Sergeant John  
Doe, Correctional Officer John Doe.1, Correctional  
Officer John Doe.2, answer the following  
interrogatories under oath, and that the  
answers be signed by the person making  
them and be served on Plaintiff within  
30 days of service of these interrogatories.

IF you cannot answer the following interrogatories in full, after exercising due diligence to secure the information to do so, so state and answer to the extent possible, specifying your inability to answer the remainder and stating whatever information or knowledge you have concerning the unanswered portions.

The interrogatories shall be deemed continuing, so as to require supplemental answers as new and different information materializes.

Plaintiff  
First of Interrogatories  
To Defendants

1. State the names or identify and attach a copy of any and all documents showing who was on duty in unit level 5 of the "R.H.U." at 6:00<sup>AM</sup> to 2:00<sup>PM</sup> shift on September 10, 2019.
2. State the names or identify and attach all written statements, original or copies, identifiable as reports about the incident on September 10, 2019, made by the prison and civilian employees of the Department of Corrections and prison witnesses.
3. State the names or otherwise identify the officers who moved Z-Coded inmate McCullough # GAB396 from cell 14 to cell 15 with the plaintiff inmate Bailey # LZ4437 on September 10, 2019 in the level 5 unit, pod "2" or "B" of the R.H.U.

Plaintiff  
First of Interrogatories  
To Defendants

4. State the names or identify any in all rules, regulations and policies regarding to Z-Code inmate's and Z-Code cell movement, attach all copies as identifiable to the plaintiff request and question.
5. Identify any and all medical records of Plaintiff from the time of the incident on September 10, 2019 in (GCI) Coal Township through and including the date of your response to this request.
6. Identify and attach a copy of any and all documents relating to all defendants Staff training and education.

CERTIFICATE OF SERVICE

I, Jeremy Bailey, CERTIFY on 26<sup>th</sup> day OF February  
THAT The Foregoing REQUEST For DOCUMENTS and  
INFORMATION IS True and CORRECT under The penalty  
OF perjury and IS being Served upon The Defendant  
VIA U.S. MAIL by placing The same in The U.S.  
MAIL THIS 26<sup>th</sup> OF February 2021

RESPECTFULLY SUBMITTED  
Jeremy Bailey #LZ 4437  
(SCI) Coal Township  
1 Kelley Drive  
Coal Township PA 17866



CLERK OF COURT  
UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT  
OF PENNSYLVANIA  
235 NORTH WASHINGTON AVENUE  
P.O. BOX 1148  
SCRANTON, PA 18501-1148  
DATE: 2.26.2021

1 Bailey LZ 4437  
in Township  
5 Y Drive  
wnship, PA 17866

INMATE MAIL  
PA DEPT OF  
CORRECTIONS



RECEIVED  
SCRANTON

MAR 04 2021

PER SP  
DEPUTY CLERK

OFFICE OF THE CLERK  
UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF PENNSYLVANIA  
235 NORTH WASHINGTON AVENUE  
P.O. Box 1148  
SCRANTON, PA 18501-1148  
PETER J. WELSH